

BROMBERG LAW OFFICE, P.C.

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MEMO ENDORSED

July 24, 2019

Via ECF

Katherine Polk Failla, U.S.D.J.
Southern District of New York
40 Foley Square
New York NY 10007

Re: *Patricia Cordell v. Western Credit & Collection Service, Inc.*
Case No. 18-CV-11879-KPF

Dear Judge Failla:

My office represents the plaintiff, Patricia Cordell, in the above-referenced case against Western Credit & Collection Service, Inc., Kevin Harker, K V Harker, Inc. d/b/a Community Association Law Group, and Michael Klaar. The lawsuit involves claims of violations of the Fair Debt Collection Practices Act, New York General Business Law § 349, and abuse of process.

I am writing to request a 60-day extension of all discovery deadlines. I am making this request for four reasons. First, I am still recovering from the problems resulting from moving my office on an emergency basis last month. I had to get a number of extensions on other cases to deal with the problems I had in locating space and then moving – these extensions cut into the time I had planned to devote to this case. Second, difficulties I had amending the complaint also slowed down the case. Third, the air-conditioning in my new office has not been working. The recent heatwave has made it difficult to work and the portable air-conditioning units we have brought in keep overloading the circuit breakers, knocking out everyone's computers. I do not know when this problem will be resolved. (If the problem is not resolved by the end of the summer, I am planning on moving again next year.) Finally, I am going to have to travel to Oregon to take multiple depositions on this case and I will need some additional time to travel cross-country to take those depositions.

Defense counsel has agreed to the above request.

Respectfully,

/s/ Brian L. Bromberg

Brian L. Bromberg

cc: Arthur J. Sanders, Esq. (Via ECF)

Application GRANTED. While the Court is reluctant to grant extended discovery extensions, Plaintiff's counsel warned the Court of the possibility of delays due to his relocation. Accordingly, the Court grants the extension. The Court hereby extends the close of fact discovery to **October 30, 2019**. The post-fact discovery conference, previously scheduled for September 5, 2019, is hereby ADJOURNED to November 7, 2019, at 4:00 p.m. No further extensions or modifications to the discovery schedule will be granted.

Dated: July 25, 2019
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE